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Cung Le, Nathan Quarry, Jon Fitch,  
Luis Javier Vazquez, Brandon Vera, and  
Kyle Kingsbury*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

In Re Subpoena Of

Top Rank, Inc. and Robert Arum

Case No.: 2:15-cv-01045-RFB-PAL

Cung Le, Nathan Quarry, and Jon Fitch,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

**PLAINTIFFS' MOTION FOR  
LEAVE TO LODGE MATERIALS  
UNDER SEAL RE NOTICE OF  
RESOLUTION OF PLAINTIFFS'  
MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS  
RESPONSIVE TO THEIR  
SUBPOENA TO THIRD PARTY  
TOP RANK, INC. AND MOTION  
TO COMPEL ATTENDANCE AT  
DEPOSITION OF ROBERT  
ARUM, PRESIDENT OF TOP  
RANK, INC. FILED JULY 31, 2017**

Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the "Protective Order") issued by this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis

1 Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others  
2 similarly situated (collectively, “Plaintiffs”) hereby move this court for leave to  
3 lodge a document under seal related to their Notice of Resolution re: Plaintiffs’  
4 Motion to Compel Production of Documents Responsive to Their Subpoena to Third  
5 Party Top Rank, Inc. and Motion to Compel Attendance at Deposition of Robert Arum  
6 (the “Notice of Resolution”).

7 Under Section 14.3 of the Protective Order, documents designated  
8 Confidential or Highly Confidential –Attorneys’ Eyes Only “shall be provisionally  
9 lodged under seal with the Court, and redacted papers shall be publicly filed.  
10 Within 5 days of the materials being lodged with the Court, the Party claiming  
11 protection shall file motion to seal setting forth the bases for sealing and proper  
12 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir.  
13 2006), or some other applicable authority.” Accordingly, Plaintiffs seek leave to  
14 lodge the following documents under seal. Following expiration of the twenty-one  
15 day period provided for in Section 5.2(b) of the Protective Order, a motion to  
16 unseal portions of the Notice of Resolution shall be filed.

17  
18 Plaintiffs seek leave to lodge under seal paragraphs numbered 1 through 5 of  
19 the Notice of Resolution, which contain the terms of resolution of a discovery  
20 dispute that the parties and Top Rank desire to remain confidential pursuant to  
21 Section 5.2(b) of the Protective Order.

22 Plaintiffs have filed the Notice of Resolution under seal, in accordance with  
23 the Court’s ECF system. Plaintiffs have publicly filed placeholders for redacted  
24 versions of these documents with the Court, and will serve un-redacted versions of  
25 these documents on Defendant and Top Rank.  
26  
27  
28

1 DATED: September 27, 2017.

2 WARNER ANGLE HALLAM  
3 JACKSON & FORMANEK  
4 PLC

5 By: /s/ Robert C. Maysey

6 Robert C. Maysey  
7 Attorney for Plaintiffs  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2017, I electronically transmitted the PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL RE NOTICE OF RESOLUTION RE: PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS RESPONSIVE TO THEIR SUBPOENA TO THIRD PARTY TOP RANK, INC. AND MOTION TO COMPEL ATTENDANCE AT DEPOSITION OF ROBERT ARUM, PRESIDENT OF TOP RANK, INC. FILED JULY 31, 2017 to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all registered users.

/s/Teresa Baldrige  
Teresa Baldrige, an Employee of  
Warner Angle Hallam Jackson &  
Formanek PLC